

45247



DEPARTMENT OF TRANSPORTATION

98 OCT 14 AM 11:37

DOCKET SECTION

Richard A. McWhirter  
Senior Vice President and Secretary  
Textron, Inc.

40 Westminster Street  
Providence, R.I. 02903  
401 / 457-2248

October 9, 1998

U. S. Department of Transportation Dockets  
Docket No. FAA-984390 - 39  
400 Seventh Street, SW, Rm. Plaza 401  
Washington, DC 20590

Sir:

Textron Aviation supports the proposed "Flight Plan Requirements for Helicopter Operations Under Instrument Flight Rules", Docket No. FAA-98-4390.

Textron Aviation operates both helicopters and airplanes for Textron Inc. The helicopter operates in the Washington to Boston NorthEast Corridor. Textron utilizes aircraft as a business tool to increase productivity. The NorthEast corridor contains some of the highest density aircraft operations in the country. This area also has a diverse mix of aircraft types. Proximity to ocean and seasonal weather patterns produce a mix of IFR, MVFR and VFR conditions. The proposed changes would enhance our ability to meet the challenges that Mother Nature creates for us.

Textron supports the proposed rule changes because:

- Promotes helicopters use of the IFR systems, makes the choice between MVFR and IFR easier and utilizes all tools to maximize safety.
- Recognizes the unique characteristics of helicopters and allows them to fit more "seamlessly" in the system, thereby increasing safety, productivity and community service.
- Consistent with goals of the FAA, NTSB, Helicopter Community, Aviation Community and local communities to "Fly Neighborly", be safe and economically benefit all.

These proposed rule changes step over the dogma of the past and accept a changing world that requires us to think anew and “partner” to gain a better foothold on tomorrow. Joseph Pulitzer said “Put it before them briefly so they will read it, clearly so they will appreciate it, picturesauely so they will remember it and above all, accurately so they will be guided by its light”. Textron feels that proposed rule meets these lofty goals and we recommend Option 2 – Partially Tabular Format as the better choice.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Chagnon". The signature is fluid and cursive, with the first name "Michael" being more prominent.

Michael E. Chagnon  
Manager  
Textron Aviation  
566 Airport Road  
Warwick, RI 02886